



Pillsbury Winthrop Shaw Pittman LLP  
31 W 52<sup>nd</sup> Street | New York, NY 10019 | tel 212.858.1000 | fax 212.858.1500

Ryan R. Adelsperger  
tel: +1.212.858.1278  
ryan.adelsperger@pillsburylaw.com

September 20, 2022

**VIA ELECTRONIC CASE FILING**

The Hon. P. Kevin Castel  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, NY 10007

*The Final Pretrial  
Submission date  
is stayed.  
SO ORDERED  
[Signature]  
USDJ  
9-20-22*

Re: ***Bilt Technologies, Inc. v. BILT, Inc. – Case No. 1:21-cv-09500-PKC***

Dear Judge Castel:

We are counsel for Plaintiff and Counterclaim-Defendant Bilt Technologies, Inc. (“Bilt Tech.”). We write on behalf of Bilt Tech. and Defendant and Counterclaim-Plaintiff BILT, Inc. (“Bilt Inc.”) to seek an extension of the current post-discovery schedule pending a decision on the parties’ pre-motion conference requests in anticipation of moving for summary judgment.

The close of discovery occurred on September 13, 2022. Multiple deadlines run from the close of discovery, including the Final Pretrial Submission Date. The parties jointly propose that all deadlines running from the close of fact and expert discovery be stayed pending a decision on the pre-motion conference requests or a decision on all summary judgment motions, whichever is later.

This is the parties’ first request to extend the post-discovery deadlines. The Court currently has a status conference set for September 23, 2022, at 12:00 p.m.

Respectfully submitted,

Ryan R. Adelsperger

cc: All counsel of record (via ECF)